

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,)
Plaintiff)
V.)
JONATHAN WILLIAM WALL,)
Defendant)

)
Criminal No. SAG-19-CR-0500

**BRIEF IN SUPPORT OF DEFENDANT'S UNOPPOSED MOTION TO EXCUSE LOCAL
COUNSEL FROM FURTHER APPEARANCES AT HEARINGS OR TRIAL**

NOW COMES the Defendant, Jonathan William Wall, by counsel, and states as follows:

This Motion is being filed out of both an abundance of caution and respect for Court process. LR 201(1)(b) states: "The Court may permit any attorney who is an active member in good standing of the bar of any other United States court or of the highest court of any state to appear and participate as counsel in a particular criminal case. Such permission shall not constitute formal admission to the Bar of this Court. However, an attorney admitted *pro hac vice* is subject to the disciplinary jurisdiction of this Court. Any party represented by an attorney who has been admitted *pro hac vice* must also be represented by an attorney who is, and continuously remains, an active member in good standing of the Bar of this Court who shall sign all documents and, unless excused by the presiding judge, be present at any court proceedings."

1. The undersigned is appearing *pro hac vice* in this matter. J. Wyndal Gordon is local counsel for the Defendant. The Motion to appear *pro hac vice* was granted 9/23/20.

[Docket No. 121.]

2. The undersigned is an experienced criminal defense attorney in both the state and federal courts in his home state of Colorado where he has built a reputation as a trial

lawyer and lead counsel in high profile cases in and out of Colorado, ranging from first degree murder to financial crimes to drugs to asset forfeiture and gang-related RICO indictments that involved a wide range of co-defendants with all of the incumbent evidentiary issues.

3. He has been lead counsel in numerous complex felony trials; and, in the civil context, civil rights class actions.
4. He has argued hundreds of motions hearings in both state and federal court.
5. His experience in criminal defense going beyond the United States criminal justice system to international issues, specifically, due process in the extradition context and comparative law, representing clients in Latin America.
6. He is licensed in numerous federal courts across the country while consistently and actively practicing in New Mexico, Colorado, and Washington, D.C.
7. He has never been sanctioned by any court or ethics committee.
8. He has read and familiarized himself with the Local Rules of this District.
9. The Defendant, like so many, has been waiting for process for months and Mr. Gordon has business outside of Baltimore On May 3, 2021. Excusing local counsel would allow local counsel to focus on other matters in his practice and would allow the Defendant and the Government to move forward in a case that has experienced delay due to the epidemic.
10. Justice, equity, and the rights of the Defendant respectfully support the granting of this unopposed motion.

WHEREFORE, the Defendant respectfully requests that local counsel be excused from further appearances at hearings or at any trial that may be held in this case.

Respectfully submitted this 19th day of April, 2021.

s/ Jason Flores-Williams, Esq.

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Counsel for Defendant Wall

s/J Wyndal Gordon

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the within document with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to all counsel of record.

/s/ Jason Flores-Williams

Jason Flores-Williams